

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:23-cv-897**

IN RE: CAMP LEJEUNE TOXIC WATER  
EXPOSURE LITIGATION

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This document relates to:

ALL CASES

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**PLAINTIFFS’ MOTION TO  
RECONSIDER ORDER GRANTING IN  
PART AND DENYING IN PART  
PLAINTIFFS’ MOTION TO COMPEL  
PRODUCTION OF ATSDR WATER  
MODELING PROJECT FILE IN NATIVE  
FORMAT**

Pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, the Plaintiffs’ Leadership Group (“PLG”) respectfully requests that the Court reconsider its Order granting in part and denying in part the PLG’s Motion to Compel Production of the ATSDR’s Water Modeling Project File in Native Format (the “Motion to Compel”) [D.E. 142].<sup>1</sup> The Court’s Order denied the PLG’s request for a “mirror image” of the Water Modeling Project File created by the Agency for Toxic Substances and Disease Registry the (“ATSDR”) (“Modeling Files”).

The PLG acknowledges that the Defendant has produced certain data related to the Modeling Files, and the PLG has dedicated significant time and resources to reconstructing the project file. However, the PLG is unable to confirm whether it accurately rebuilt the ATSDR’s model without a “mirror image” copy of the Modeling Files to confirm the accuracy of its work.

Accordingly, PLG respectfully requests that the Court compel the government to produce a clone or mirror copy of the ATSDR’s water modeling project file in native format, and for such other and further relief as the Court deems just and proper.

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<sup>1</sup> The PLG filed a memorandum in support of the Motion to Compel, to which it attached various exhibits. [D.E. 143].

Date: May 3, 2024

Respectfully Submitted

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**CERTIFICATE OF SERVICE**

I, J. Edward Bell, III, hereby certify that the foregoing document was electronically filed on the Court's CM/ECF system on this date, and that all counsel of record will be served with notice of the said filing via the CM/ECF system.

This the 3rd day of May, 2024.

/s/ J. Edward Bell, III\_\_\_\_\_

J. Edward Bell, III